West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10700182-2016**
Application Received: **May 14, 2015**
Plant Identification Number: **10700182**
Permittee: **The Chemours Company FC, LLC**
Facility Name: **Washington Works**
Business Unit: **Fluoropolymers (Part 2 of 14)**
Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

Physical Location:	Washington, Wood County, West Virginia
UTM Coordinates:	442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions:	From I-77, take the Route 50 bypass around Parkersburg towards Ohio. Take the last exit prior to the bridge exit from the Route 50 Bypass onto DuPont Road. At the light turn left onto DuPont road. The facility is on the right approximately ½ mile from the turn.

Facility Description

Within the Fluoropolymers Business Unit, there are the following Fluoroproduct production areas: C1P, C2, C3, T1-T4 and T7, T5, and T6. Each area produces a product or family of products by varying operating conditions and small adjustments to raw material ratios or material feed rates. The following is a general description of the operations in each of the Fluoroproduct production areas within the Fluoropolymers Business Unit.

C1P Area

Within the "C1P" area of DuPont Washington Works is a process capable of producing a variety of products in dispersion, flake and cube form. These products are made from fluoromonomers produced at the Washington Works Facility along with monomers from outside sources. The main product from this process is TEFLON® PFA.

C2 Area

The C2 Area manufactures fluoropolymer resins by precharging fluoromonomers into reactors along with demineralized water. Aqueous solutions of catalyst salts are then pumped into the reactors to initiate polymerization. Additional fluoromonomers are fed into the reactors as the reaction proceeds. Unreacted fluoromonomers are vented to recycling facilities at the end of the reaction. The remaining fluoropolymer and water slurry is pumped to agglomerators that mechanically separate the fluoropolymer from the water. Alternatively, the reactor output may be sent to facilities which concentrate the dispersion to higher solids and package the dispersion for sale. From the agglomerators, the polymer is conveyed to devices where water and other low boiling compounds are removed prior to extrusion. The polymer is then converted to pellets via an extrusion process. The pellets are hot air sparged to remove additional traces of miscellaneous volatile fluorocarbons, elutriated to remove traces of polymer fines and packaged for distribution

C3 Area

The C3 area manufactures various molecular weight Telomers, which are short, straight chain carbon-fluorine compounds. Telomer products are most commonly made up of the short chain compounds with four to fourteen carbons. There are several recipes, one of which is selected to make a desire product. All recipes perform similarly in that:

- Lower molecular weight (MW) Telomers are added to a reactor.
- Monomer and other raw materials are added and reacted to form more lower MW Telomers and to convert lower MW Telomers to higher MW Telomers.
- At the end of reaction, the reaction mass is transferred to distillation which is used to separate the different MW Telomers. Lower MW Telomers are put into hold tanks for re-use in the reactor. Higher MW Telomers remain in the distillation pot and become Telomer product.
- The Telomer product is filtered and transferred to product storage tanks.
- The finished Telomer product is loaded into tank trailers for shipment.

T1-T4, and T7 Areas

The T1-T4, and T7 areas produce final products fluoromonomers tetrafluoroethylene (TFE) and hexafluoropropylene (HFP); an intermediate, perfluorocyclobutane; and byproducts hydrogen chloride (HCl, aqueous) and calcium fluoride (CaF2, solid). The production facility is divided into the following sections: T1-TFE Synthesis, T2-TFE Refining, T3-HFP Synthesis, T4-HFP Refining, and T7-Utilities.

Fluorocarbons are reacted by pyrolysis in the T1 area and the products are separated to form crude TFE and recovered byproducts. TFE is refined in the T2 area. In-process materials and intermediates are reacted by pyrolysis in the T3 area to form crude HFP that is then refined in the T4 area. The T7 area is comprised of several utilities, including: refrigeration and cold brine supply; the unit vacuum systems for maintenance clearing of equipment; waste acid neutralization; and the thermal converter. The thermal converter combusts fluorine-containing byproduct gases from the T1-T4 process areas and from polymerization operations in the C1P, C2, C3, and T6 areas; and from two different non-hazardous fluorine-containing liquid streams to produce aqueous hydrogen fluoride (HF) which is reacted with slaked lime (calcium oxide or CaO) to form CaF_2.

T5 Area

The T5 area produces fluoropolymer resin. The basic processes used are polymerization, drying, and modification. The resin is produced by water based emulsion polymerization in one of two reactor units. Water, monomer (primarily tetrafluoroethylene), process aids, and other minor ingredients are introduced to the reactor. The reaction starts under elevated pressure, but proceeds to an endpoint at sub-ambient pressure. The resin is removed as slurry and is stored in one of several tanks pending further treatment and drying. The polymer slurry is processed and dried. The wet polymer passes through one of two dryers. Emissions from either dryer pass through cyclone

separators to recover particulate matter. Both cyclone systems employ a water spray to improve effectiveness. The material recovered from the cyclones is returned to the process. Dried resin is transferred to a pack-out room where it is drummed using automated equipment. Air from the pack-out room is exhausted though a scrubber. The recovered material from the packout exhaust is not recycled to the process.

T6 Area

The Teflon® T6 area produces TFE based homopolymers in four agitated batch reactors. The reaction takes place in an aqueous medium, and a milk white raw polymer dispersion in water is produced. A portion of the raw dispersion production is dried and sold as powder, and a portion is processed and sold as a finished aqueous dispersion.

Copolymer dispersion products are also made. A batch is started by adding water and other ingredients to the reactor. Polymerization takes place in the aqueous phase at high temperature and pressure. At the end of each batch, most of the unreacted material is recycled for reuse or sent to the thermal converter. Some products are made by partially concentrating the reactor output in a water/solids separation vessel where some of the water is removed. For product sold as fine powder, the material is dried at high temperature with subsequent removal of impurities. The dried product is cooled and packaged.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]

Regulated Pollutants	Potential Emissions Part 2 of 14	2014 Actual Emissions Part 2 of 14
Carbon Monoxide (CO)	23.82	10.13
Nitrogen Oxides (NO_X)	38.88	13.65
Particulate Matter ($PM_{2.5}$)	11.72	5.96
Particulate Matter (PM_{10})	18.37	7.58
Total Particulate Matter (TSP)	18.37	7.58
Sulfur Dioxide (SO_2)	2.51	0.11
Volatile Organic Compounds (VOC)	239.38	88.5

PM_{10} is a component of TSP.

Hazardous Air Pollutants	Potential Emissions Part 2 of 14	2014 Actual Emissions Part 2 of 14
Methylene Chloride	33.95	10.9
Total HAPs	43.19	14.22

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAPs, Chemours Washington Works is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.
	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	45CSR18	Prevent and control emissions from Commercial and Industrial Solid Waste Incineration Units (CISWI).
	45CSR34	Emission Standards for Hazardous Air Pollutants.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. 61	Asbestos inspection and removal
	40 C.F.R. 62, Subpart XX	Approval and Promulgation of State Plans for Designated Facilities and Pollutants.
	40 C.F.R. 63, Subpart FFFF	Miscellaneous organic chemical manufacturing (MON) MACT.
	40 C.F.R. 63, Subpart EEEE	Organic liquids distribution (OLD) MACT.
	40 C.F.R. 63, Subpart DDDDD	Boiler MACT
	40 C.F.R. 63, Subpart GGGGG	Site remediation MACT.
	40 C.F.R. 63, Subpart NNNNN	Hydrochloric acid production MACT.
	40 C.F.R. 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR§21-30	Control of VOC emissions from cold and solvent metal cleaning.
	45CSR§21-40	Control of VOC emissions
	45CSR27	Best Available Technology (BAT) for HAPs

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Area	Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit *(if any)*
All	R13-3223	December 8, 2014	NA
C1P	R13-2365H	September 4, 2015	NA
C2	R13-1953J	September 4, 2015	NA
C3	R13-2391I	August 7, 2015	NA
T1, T2, T3, T4, and T7	R13-1823L	September 4, 2015	NA
T5	R13-1353H	September 4, 2015	NA
T6	R13-0815J	September 4, 2015	PD16-005

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following miscellaneous changes were made as part of this Title V renewal:

The boilerplate has been updated to the most current version of the Title V Permit.

Updated the Permittee's phone number.

Updated the NSR Permits to the most recent version in the Table of Contents, Section 1.2, and the attachments in the appendices.

Changed monitoring requirements in Conditions 6.2.1 and 9.2.1 to remove the phrase "with a maximum of forty-five days between consecutive readings" to provide consistency for monitoring requirements throughout the facility. Changed Conditions 4.2.1, 5.2.2, 6.2.1, 7.2.1, 8.2.1, and 9.2.1 to replace the phrase "for a sufficient time interval" to "for 1 minute" to specify the time interval used to determine if there are visible emissions.

Previous Condition 6.4.6 required monthly recordkeeping to verify that the emission units listed in Condition 6.1.2 were routed to the required control device. The facility has made these permanent installations with hard piped connections such that they will permanently be vented to the associated control device unless a permit modification is approved to change the control devices. Condition 6.4.6 has been changed to "Reserved."

45CSR18 – *Control of Air Pollution from Combustion of Solid Waste*

40CFR§62.12155(b) (40CFR62, Subpart XX) consolidated all existing 111(d)/129 incinerator regulatory requirements of Chemours Commercial Industrial Solid Waste Incinerator (CISWI) Unit (T7IMC) into 45CSR18.

All references to CISWI 111(d)/129 have been removed from this Permit.

This rule has been updated since the last issuance of this Permit. In addition to changes in citation for the requirements, the following changes have been made:

Condition 7.1.15 – The averaging time for Hydrogen Chloride has changed from a 1 hour minimum sample time per run to either a minimum volume of 1 dry standard cubic meter or 120 liters per run. Alternate test methods for hydrogen chloride, mercury, opacity, and oxides of nitrogen have been added.

Condition 7.1.16 – The exception of meeting the emission limitations during startups, shutdowns, or malfunctions has been removed.

Condition 7.1.22 – Operator training and qualification requirements have been added.

Condition 7.1.23 – States that the use of the bypass stack at any time is an emissions standards deviation for particulate matter, HCl, Pb, Cd, Hg, NO_x, SO_2, and dioxin/furans.

Condition 7.2.2 – The calculations are now based on the lowest 1-hour average.

The facility performed a stack test for their Commercial Industrial Solid Waste Incinerator (CISWI) Unit (T7IMC) on June 23, 2015 and submitted the results on August 12, 2015. The new parameters for minimum pressure drop across the wet scrubber, minimum scrubber liquor flow rate, and minimum scrubber liquor pH have been updated in Condition 7.2.2.

This Rule previously contained conditions that calculated the minimum pressure drop of the scrubber, minimum scrubber liquor flow rate, and minimum scrubber liquor pH as 90% of the average values measured during the most recent performance test. This provision has been removed from 45CSR18. The requirements have been updated in Conditions 7.2.2b, c, and d.

Condition 7.2.9 – Initial and annual inspections as well as developing a site-specific monitoring plan have been added.

Condition 7.2.10 – A requirement to develop a site-specific monitoring plan for each continuous monitoring system has been added.

Condition 7.2.11 – Requirements on the installation and operation of flow sensors have been added.

Condition 7.2.12 – Requirements on the installation and operation of pressure sensors have been added.

Condition 7.2.13 – Requirements on the installation and operation of a pH monitoring system have been added.

Condition 7.2.14 – A requirement to install, calibrate, maintain, and operate a device to measure bypass stack usage has been added.

Condition 7.2.15 – A requirement to operate the monitoring system and to collect data has been added.

Condition 7.3.1 – The test methods have been added. All pollutants in Condition 7.1.15 except for opacity may now be tested less frequently if the actual emissions are less than 75% of 45CSR18 emission limits.

Condition 7.3.2 – This was a requirement for an initial performance test. As this test has been completed, the requirement has been removed and listed as “Reserved”.

Condition 7.4.8 has additional recordkeeping requirements.

Condition 7.5.1 has additional reporting requirements.

Conditions 7.5.2 and 7.5.3 have been consolidated and Condition 7.5.3 has been listed as "Reserved".

40CFR63, Subpart DDDDD – *NESHAPs for Industrial, Commercial, and Institutional Boilers and Process Heaters.*
The following natural gas units are subject to the Boiler MACT:

T5HA, T5HB, T1CA, T1CB, T1CC, T1CD

In general, all requirements for these units to be in compliance, to do initial tune-ups and one time energy assessments, and to include the reporting with the Notice of Compliance Status by January 31, 2016 have been met and omitted from this Permit.

Condition 3.1.20 which had boiler and process heater provisions has been changed to "Reserved" as the Boiler MACT has been promulgated.

Condition 3.4.11 has been added to require recordkeeping regarding this MACT for all affected units.

Condition 7.1.21 has been added to require a biennial tune-up for T1CA (< 10 million BTUs/hr) and annual tune-ups for T1CB, T1CC, and T1CD (≥ 10 million BTUs/hr). The facility must also operate and maintain these units in a manner consistent with safety and good air pollution control practices.

Condition 7.4.14 contains recordkeeping provisions for these units and include annual or biennial reports that require records of the concentration of CO, any corrective actions, and type and amount of fuel used.

Condition 7.5.7 contains reporting requirements and notifications.

Condition 8.1.15 has been added to require tune-ups every five years for units T5HA and T5HB (< 5 million BTUs/hr). The facility must also operate and maintain these units in a manner consistent with safety and good air pollution control practices.

Condition 8.4.8 contains recordkeeping provisions for these units and include five year reports that require records of the concentration of CO, any corrective actions, and type and amount of fuel used.

Condition 8.5.2 contains reporting requirements and notifications.

40C.F.R. 63 Subpart NNNNN – HCL MACT
The facility performed a stack test (as required by Condition 7.3.3) for unit T7IMC on June 23, 2015. The results include a minimum scrubber flow rate (4th stage) of 41.6 gpm, and a minimum scrubber liquor pH of 7.8. Condition 7.2.4 requires the Permittee to follow these operating limits to show compliance with the HCl and Cl_2 emission limits of 7.1.18.

Title V Administrative Amendments/Minor Modifications/R13 Changes

The renewal includes Minor Modifications MM09-MM18 as well as changes to R13-0815I, R13-2391I, and PD16-005.

1. **R13-2365F**
   The NSR Permit was withdrawn on November 25, 2013.

2. **MM09 – R13-2365G**

This modification resulted in revised emission calculations and additional VOCs from de-inventorying and re-inventoring, transferring an emission source, and revised particulate matter monitoring. The following changes were made:

For Condition 4.1.1, increased the VOC emission rate for C1FQE from 21.00 to 21.76 tons per year. Increased the VOC emission rate for C1FWE from 26.55 pph to 32.2 pph, and from 0.29 tons per year VOCs to 0.35 tons per year. Also included acetonitrile being emitted in quantities of <0.01 lbs/hr and <0.01 tons per year from C1FWE. Increased total VOC emissions from emission point C1GXE from 0.29 to 0.31 tons per year. Moved C2EQ (an oven) from area C2 (previously covered under R13-1953H) and renamed as source C1GZ (renamed in the equipment table), venting to a vacuum pump (C1GZC), then to emission point C1GZE. Emissions added for this source are 0.51 pph and 0.18 tons per year VOCs, < 0.01 pph and < 0.01 tpy of hydrofluoric acid, <0.01pph and <0.01 tpy of particulate matter emissions, and 0.01 pph and 0.01 tpy of carbon monoxide. Removed Appendix A, Attachment D. Changed monitoring requirements in Condition 4.2.1 to remove the phrase "with a maximum of forty-five days between consecutive readings" to provide consistency for monitoring requirements throughout the facility. Added control device C1GZC Vacuum Pump with associated settings and monitoring to Condition 4.2.2. Note that R13-2365G neglected to update the control device C1GZC description (scrubber) to (vacuum pump) although it was described in the engineering evaluation and the associated monitoring and operating parameters were updated. This has been corrected in the equipment table and Condition 4.1.1.

3. **MM17 – R13-2365H**

Removed the limitation of APFO from Condition 4.1.1 for Emission Point ID C1FSE as well as Footnote 1 describing APFO and renumbered Footnote 2 as Footnote 1. Removed the Ammonium Perfluorooctanoate (APFO) emission sources from Condition 3.1.12, screening levels from Condition 3.1.13, and modeling requirements from Condition 3.2.1 and renamed the Conditions as "Reserved". Added Condition 3.1.22 that states "The Permittee shall not purchase, manufacture, store, or use Ammonium Perfluorooctanoate (APFO) within the Chemours' Washington Works Facility." Removed the APFO column from the monthly emissions recordkeeping form Appendix A, Attachment B. Removed the APFO table from the annual emissions recordkeeping form for equipment ID C1FS in Appendix A, Attachment C. The other pollutants that require annual emissions recordkeeping remain in this Attachment C for emission unit C1FS.

4. **MM11 – R13-1953I**

Moved emission unit C2EQ (moved to R13-2365G) to the C1P Area and renamed it as C1GZ in the equipment table. Removed emission unit C2KQ from the equipment table. C2KQ no longer emits regulated air pollutants. Also removed C2KQ from Condition 5.1.2 and from Appendix B, Attachments B and C. Removed Emission Source C2EQ and emission point C2EQE from Conditions 5.1.1, 5.1.2, 5.1.3, 5.1.8, and 5.1.9. Removed the Vacuum Pump C2EQC from Condition 5.2.4. Removed several references to Source ID C2EQ, Control Device ID C2EQC and Emission Point ID C2EQE from the Tables in Appendix B; Attachments A through D of the permit. Changed monitoring requirements in Condition 5.2.2 to remove the phrase "with a maximum of forty-five days between consecutive readings" to provide consistency for monitoring requirements throughout the facility. Changed the language in Condition 5.2.3 to remove the exemption from the maximum forty five (45) day period between monitoring checks and require monitoring monthly or during the next available operating session.

5. **MM16 – R13-1953J**

Removed the APFO limitation of Condition 5.1.5 and changed it to "Reserved." Removed the Ammonium Perfluorooctanoate (APFO) emission sources from Condition 3.1.12, screening levels from Condition 3.1.13, and modeling requirements from Condition 3.2.1 and renamed the Conditions as "Reserved". Added Condition 3.1.22 that states "The Permittee shall not purchase, manufacture, store, or use Ammonium Perfluorooctanoate (APFO) within the Chemours' Washington Works Facility." Removed the reference to APFO in the footnote of Table 5.2.1 of Condition 5.2.1. Removed the column APFO from Appendix B, Attachment B and the table APFO from Appendix B, Attachment C.

6. **R13-2391I**

Emission sources C3IP and C3IQ as well as Emission Point ID C3IQE have been removed. Emission source C3JA still vents through Emission Point ID C3IPE. The emission limits for C3IPE have been changed in Condition 6.1.3. Emission source C3IQ and emission point C3IQE have been removed from the equipment table. Emission Point C3IQE has been removed from Condition 6.1.3. Emission sources C3IP and C3IQ have been removed from Table 6.1.4 of Condition 6.1.4. Emission sources C3IP and C3IQ have been removed from Appendix C, Attachments B and C. C3IPE and C3IQE have been removed from Appendix C, Attachments B and C except for where C3IPE is an emission point for C3JA.

7. **MM12 – R13-1823K**

Emission Point T7XIE had several emission units that used methanol, which is a HAP. The emission units have switched to either ethanol (a VOC) or citric acid. The VOC limit for T7XIE has changed from 2,795 lbs/hr and 34.14 TPY to 2,440 lbs/hr and 33.83 TPY in Condition 7.1.1. Methanol recordkeeping has been removed from Appendix D Attachment E. The Methanol emission limits have been removed from Conditions 7.1.2 and 7.1.4. The VOC emission limit in Condition 7.1.4 has been changed from 19.8 TPY to 19.5 TPY. Changed monitoring requirements in Condition 7.2.1 to remove the phrase "with a maximum of forty-five days between consecutive readings" to provide consistency for monitoring requirements throughout the facility.

8. **MM15 – R13-1823L**

Changed Condition 7.1.3 that has a APFO limit to "Reserved" and added Condition 3.1.22 that states "The Permittee shall not purchase, manufacture, store, or use Ammonium Perfluorooctanoate (APFO) within the Chemours' Washington Works Facility." Removed the Ammonium Perfluorooctanate (APFO) emission sources from Condition 3.1.12, screening levels from Condition 3.1.13, and modeling requirements from Condition 3.2.1 and renamed the conditions as "Reserved". Removed APFO recordkeeping from Appendix D, Attachment E.

9. **MM10 - R13-1353G**

Emission sources T5HK and T5HL are being removed as they no longer emit ozone-depleting compounds (ODC) or other regulated air pollutants. Emission sources T5HK and T5HL have been removed from the equipment table. Emission source T5HG had an increase in VOC emissions that was previously requested but left out of R13-1353E. Therefore, VOC emission limits of 0.06 lbs/hr and 0.15 TPY were added for emission source T5HG. The ODC emission limits from Emission Points T5HIE and T5HKE have been removed from Condition 8.1.1. Condition 8.1.8 has been changed to "Reserved" as T5HKE no longer emits ODC. The T5HKC vent condenser exit temperature requirement from Condition 8.1.7 has been changed to "Reserved" since emission sources T5HK and T5HL no longer emit ODC. Condition 8.2.3, which monitored the temperature of previous Condition 8.1.7 has been changed to "Reserved" as well. Changed monitoring requirements in Condition 8.2.1 to remove the phrase "with a maximum of forty-five days between consecutive readings" to provide consistency for monitoring requirements throughout the facility.

10. **MM14 – R13-1353H**

Removed APFO emission limits for emission points T5HGE and T5HIE from Condition 8.1.1 and also removed footnote #1. Removed the Ammonium Perfluorooctanate (APFO) emission sources from Condition 3.1.12, screening levels from Condition 3.1.13, and modeling requirements from Condition 3.2.1 and renamed the conditions as "Reserved". Added Condition 3.1.22 that states "The Permittee shall not purchase, manufacture, store, or use Ammonium Perfluorooctanoate (APFO) within the Chemours' Washington Works Facility." Removed the words "and APFO" from the monitoring requirements of Condition 8.2.2.

11. **R13-0815I**

Replaced R13-1823D with R13-1823 in Condition 9.1.2.

12. **MM13 – R13-0815J**

Removed "and APFO" from the type of liquor in Condition 9.1.4. Removed APFO limits for emission points T6PME, T6IGE, T6IZCE, T6IVE, T6IEE, T6IFE, T6IXE, and T6IYE as well as footnote #2 from Condition 9.1.5. Added Condition 3.1.22 that states "The Permittee shall not purchase, manufacture, store, or use Ammonium Perfluorooctanoate (APFO) within the Chemours' Washington Works Facility." Removed the Ammonium Perfluorooctanate (APFO) emission sources from Condition 3.1.12, screening levels from Condition 3.1.13, and modeling requirements from Condition 3.2.1 and renamed the conditions as "Reserved".

13. **MM18 – PD16-005**

A solid-liquid separation tank (T6SJ) with corresponding emission point (T6SJE) was added to the equipment table. Although the permit determination stated that there was no permit needed, there was an increase in VOC emissions of 0.14 lbs/hr and 0.24 TPY as a result of the addition of this tank. This has been added to Condition 9.1.5 and the authority is stated as 45CSR§30-12.7. As the tank is only 3.8 cubic meters with a feed stream of 93.5% water, 40CFR60, Subpart Kb does not apply.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

a. 40CFR64 – "Compliance Assurance Monitoring (CAM)"
There have been no changes to this Part 2 of 14 Permit that increased any Pollutant Specific Emission Unit's (PSEU) pre-control device PTE to at least 100 percent of the amount, in tons per year, required for the PSEU to be classified as a major source.

b. 40 C.F.R. 63, Subpart ZZZZ – NESHAPs for reciprocating internal combustion engines (RICE) MACT.
Emergency Generator T7JJ is an existing emergency generator that has a site rating greater than 500 brake HP. It was incorrectly listed in the R30-10700001-2010 Part 2 of 14 Title V Permit as being built/modified in 2006. This generator was installed and manufactured in 2000. Although the company submitted an initial notice of compliance dated August 12, 2004, according to 40CFR§63.6590(b)(3)(iii), this engine does "not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements" since it is an existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year. Therefore this engine is exempt for this MACT.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	Monday, March 14, 2016
Ending Date:	Wednesday, April 13, 2016

Point of Contact

All written comments should be addressed to the following individual and office:

Mike Egnor
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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

(**Choose**) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.